

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JASON DOHERTY,

Plaintiff,

Docket No.  
18-cv-10898 (NSR)

- against -

PATRICIA BICE, individually and as Dean of Student  
Affairs for Purchase College, State University of New  
York; JARED STAMMER, individually and as Conduct  
Officer for Purchase College, State University of New  
York; and QUI QUI BALASCIO, individually and as  
Associate Dean for Student Affairs for Purchase College,  
State University of New York,

**AFFIRMATION**

Defendants.  
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E. CHRISTOPHER MURRAY, an attorney duly admitted to practice law before the  
Courts of the State of New York, affirms under penalty of perjury, as follows:

1. I am a partner in Ruskin Moscou Faltischek, P.C., attorney for plaintiff. I submit  
this Affirmation in opposition to defendants' motion to dismiss pursuant to Fed.R.Civ.P. 12(b)  
(6) and (c).
2. Attached as Exhibit 1 hereto is a true and correct copy of portions of the  
deposition of Jared Stammer, a defendant in this matter.
3. For the reasons set forth above and in the accompanying memorandum of law,  
defendants' motion should be denied in its entirety.

Dated: Uniondale, New York  
August, 30, 2022

  
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E. CHRISTOPHER MURRAY